

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal Case No. CR 21-146 (ADM)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.)
)
)
THOMAS WILDER MOSELEY,)
)
 Defendant.)

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO
FILE POSITION PLEADING**

Defendant Thomas Wilder Moseley, through undersigned counsel, hereby moves the court for an Order granting an extension of time to file position pleadings from November 12 to November 19, 2021. The grounds for this motion include 1) undersigned counsel has multiple other deadlines which make it difficult to complete the position pleading by today's deadline, 2) undersigned counsel has been receiving numerous letters from supporters and wants to have all available information when preparing the position pleading, 3) the current deadline is based on the final PSR being filed on October 29, 2021, but the PSR was filed at night and the Court did not actually provide undersigned counsel with electronic access to the PSR until November 1, and 4) since the sentencing hearing is not scheduled until January 5, 2022, there will not be any prejudice or inconvenience from the extension. This motion is based on all files, records and

proceedings.

Dated: November 12, 2021

LAW OFFICE OF JORDAN S. KUSHNER

By s/Jordan S. Kushner

Jordan S. Kushner, ID 219307

Attorney for Defendant

431 South 7th Street, Suite 2446

Minneapolis, Minnesota 55415

(612) 288-0545